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01 March 2024

Department of Infrastructure, Transport,  
Regional Development, Communications and  
the Arts

By submission:

**RE: Better Delivery of Universal Services – Discussion Paper**

The Internet Association of Australia Ltd (**IAA**) thanks the Department of Communications for the opportunity to respond to the consultation on the Better Delivery of Universal Services Discussion Paper.

IAA is a member-based association representing Australia’s Internet community. Our membership is largely comprised of small to medium sized Internet Service Providers (**ISPs**), many of whom also provide other classical telecommunications services. Our response is primarily in representation of such members, the telecommunications industry, as well as the broader public good in relation to the Internet.

IAA and our members are very glad to see this broader review into the delivery of universal services, and believe it to be long overdue. We are keen to work with government, the industry, civil society and other stakeholders to develop a universal services framework that is fit for purpose, not only in today’s modern world, but also for the future.

## RESPONSE TO QUESTIONS

- 1. What do you consider are the key outcomes that a modern universal service framework should deliver?***
- 4. Which existing requirements under the current universal service framework should be retained, or changed?***

Overall, the universal service framework should be efficient, future-proof, deliver high quality service, and be capable of evolving to meet changing consumer expectations and technology capabilities.

In order to meet these outcomes, we are of the firm belief that the framework must be specific to performance and service delivery standards, rather than being designed to specify a technology or technology provider, or in a way that would preclude services or technologies that are suitable. As such, we strongly recommend changes to the current universal service framework which relies on specific technologies, such as copper.

In addition, a key problem with the current way in which the universal service framework operates is that it entrenches monopolies or established players while inhibiting competition in the telecommunications sector. Going forward, funding should be based on open access

infrastructure. If government has funded the infrastructure, then access to such should be open. The operation of the universal services framework should be such that all providers can access what is public infrastructure, and therefore have an equal footing. Another related issue is the cost of backhaul and to interconnect. We believe that statutory infrastructure providers should be required to connect to mandated readily available interconnection points, and/or aggregation POIs.

**7. How should affordability be considered?**

**8. How can a modern universal service framework deliver better outcomes and meet digital inclusion needs of First Nations Australians?**

We believe that resolving the above issues would result in positive consequences that could also address concerns surrounding affordability, and better outcomes for First Nations and rural and remote communities. The cost and availability of backhaul is a major issue that prevents better service provision in rural and remote Australia where many First Nations and other vulnerable communities are based. Furthermore, shifting the focus to be on performance, and being more open to diverse technologies so long as they are able to deliver the requisite service, should also provide better outcomes.

**2. What safety-net services does a modern universal service framework need to address?**

**3. To what extent do you consider mobile services are important to complement fixed services supported under the existing framework?**

As per our general position, we support using diverse technologies to ensure that consumers are provided with high quality services. However, we also note an issue with mobile services in relation to its operation when making emergency calls. Noting the ability to connect to emergency services to be an integral service that Australians must have, we understand that from 4G technology onwards, operators have been relying on 3G fallback for emergency handoff in some technical cases. This has meant that as 3G technology is retired, emergency handoffs may cease working. While not directly related to the universal services framework, we believe it is important that government makes sure that as part of its funding contracts, providers are expressly made to ensure proper emergency handoff operations.

Discussion has also emerged in recent times to include internet access as part of any universal service. Should access to the internet be included as part of any obligation, it is important that true internet access be the case, and not a cut down subset of services, deemed to be "internet". A true internet access system includes any to any connectivity, with a multitude of paths from any network to any other network, giving end users a myriad of choices in the providers and content sources they access, or indeed themselves provide. This has not necessarily been the case in mobile networks and we caution that the provision of mobile services will not necessarily provide internet access should this be the future policy position. Australia's mobile networks also do not directly connect to the commonly used Australian internet exchange points, thus again preserve the dominance of major players in the Australian market. Our position again is that any standards be imposed from a perspective of service performance not a specific technology and act as a truly universally available service.

## CONCLUSION

Once again, IAA appreciates the opportunity to respond to the Better Delivery of Universal Services Discussion Paper. We support the government's commitment to find ways to improve the delivery of telecommunications services. As discussed above, we believe this is very necessary, and in order to achieve this, there needs to be a change in focus and approach to ensure actual high quality services. We look forward to continue working with government, industry and other stakeholders to develop a modern universal service framework that is fit for purpose.

## ABOUT THE INTERNET ASSOCIATION OF AUSTRALIA

The Internet Association of Australia (IAA) is a member-based association representing the Internet community. Founded in 1995, as the Western Australian Internet Association (WAIA), the Association changed its name in early 2016 to better reflect our national membership and growth.

Our members comprise industry professionals, corporations, and affiliate organisations. IAA provides a range of services and resources for members and supports the development of the Internet industry both within Australia and internationally. Providing technical services as well as social and professional development events, IAA aims to provide services and resources that our members need.

IX-Australia is a service provided by the Internet Association of Australia to Corporate and Affiliate members. It is the longest running carrier neutral Internet Exchange in Australia. Spanning six states and territories, IAA operates over 30 points of presence and operates the New Zealand Internet Exchange on behalf of NZIX Inc in New Zealand.

IAA is also a licenced telecommunications carrier, and operates on a not-for-profit basis.

Yours faithfully,

Narelle Clark  
Chief Executive Officer  
Internet Association of Australia